

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

~ vs ~

RAUL TORRES,

Defendant.

CASE NO.: 1:19-CR-00390

JUDGE DONALD C. NUGENT

SECOND UNOPPOSED
MOTION TO CONTINUE SENTENCING
HEARING FOR FORTY-FIVE (45) DAYS

Now comes the Defendant, **Raul Torres**, by and through his undersigned counsel, and respectfully requests this Honorable Court issue an Order continuing the Sentencing Hearing, presently scheduled for December 17, 2019, for a period of forty-five (45) days, for the following reasons.

The Government and the Defendant agreed upon a restitution payment in the amount of \$1,037,000.00, to be paid prior to Sentencing. To date, Defendant has been able to secure more than \$900,000.00 of the necessary funds to be applied to the restitution. Defendant has been diligent in his efforts to secure the full \$1,037,000.00 restitution payment and is confident he will have the full amount should his Sentencing Hearing be continued for forty-five (45) days.

WHEREFORE, for the foregoing reasons, it is respectfully requested that this Honorable Court issue an Order continuing the Sentencing Hearing, presently scheduled for December 17, 2019, for a period of forty-five (45) days. The Government has been consulted on this motion and does not object.

Respectfully submitted,

/s/ - Michael J. Goldberg

THE GOLDBERG LAW FIRM

BY: MICHAEL J. GOLDBERG

Ohio Reg. No.: 0040839

323 Lakeside Avenue, Suite 450

Cleveland, Ohio 44113

(216) 696-4514 - Telephone

(216) 781-6242 - Facsimile

mjgjd@aol.com - Email

www.michaeljgoldberg.net – Website

Counsel for **DEFENDANT RAUL TORRES**

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of November, 2019, a copy of the foregoing has been filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ - Michael J. Goldberg

MICHAEL J. GOLDBERG, ESQ.